

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

Date filed: February 8, 2019

Name of company(s) covered by this certification: **US Signal Company, L.L.C.**

Form 499 Filer ID: 822528

Name of signatory: Barbara L. Boshoven

Title of signatory: Vice President of Corporate Affairs, Assistant Secretary

I, **Barbara L. Boshoven**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not taken** actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company **has not received** customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Sincerely,



Barbara L. Boshoven

Vice President of Corporate Affairs, Assistant Secretary

Date: February 8, 2019

Attachment

CPNI Compliance Explanation

US Signal markets exclusively to other telecommunications carriers, businesses, institutions and government entities. No services are sold to consumers. As such, US Signal's commercial service agreements are negotiated with each customer, including the requirements to safeguard customer information. Through this negotiation, each customer acknowledges: 1) that the use of CPNI for any purpose other than to further the delivery of customers' services; and 2) disclosure or revelation of the CPNI to any person or entity other than its employees, directors, officers, agents, and consultants (who have a need to know to further the delivery of services, and are subject to legally binding obligations of confidentiality and non-use, no less restrictive than those contained in the agreement between the companies) by US Signal is strictly forbidden and will result in immediate severance and possible prosecution to the fullest extent of the law. During the term of any agreement, customers designate their vendor interfacing personnel (or vendors) who have the authority to release or receive customer's CPNI under the terms of the agreement to their dedicated US Signal account representative(s). Those permissions are maintained in customer account information for all US Signal employees to access in order to support customer needs.

US Signal incorporates training for the handling of CPNI to its employees through new hire training and ongoing confidentiality training due to compliance obligations for other customer data subject to such confidentiality compliance and/or negotiated terms.

US Signal maintains records of its marketing campaigns to its customers should any utilize CPNI. US Signal does not share CPNI with any third parties for marketing purposes. Customers may opt out of any marketing campaign or future campaign by notifying their US Signal account representative or US Signal's marketing department directly.

All on-line access to customer CPNI via US Signal's customer portal is authenticated via authorized account credentials.